

# **Exhibit B**

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**From:** David Jeffries <[djeffries@jeffrieslaw.nyc](mailto:djeffries@jeffrieslaw.nyc)>  
**Sent:** Saturday, January 18, 2020 7:18 PM  
**To:** Doran, Marissa <[mdoran@paulweiss.com](mailto:mdoran@paulweiss.com)>; [restituyo@restituyolaw.com](mailto:restituyo@restituyolaw.com)  
**Cc:** Birenboim, Bruce <[bbirenboim@paulweiss.com](mailto:bbirenboim@paulweiss.com)>; Johnson, Jeh C <[jjohnson@paulweiss.com](mailto:jjohnson@paulweiss.com)>; Buergel, Susanna M <[sbuergel@paulweiss.com](mailto:sbuergel@paulweiss.com)>  
**Subject:** Re: Cardwell v. Davis Polk et al., 19-cv-10256

Yes. That is correct. We are amenable to receiving and serving future discovery requests by email.

Kind regards,

David

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**From:** Doran, Marissa <[mdoran@paulweiss.com](mailto:mdoran@paulweiss.com)>  
**Sent:** Saturday, January 18, 2020 7:11:18 PM  
**To:** David Jeffries <[djeffries@jeffrieslaw.nyc](mailto:djeffries@jeffrieslaw.nyc)>; [restituyo@restituyolaw.com](mailto:restituyo@restituyolaw.com) <[restituyo@restituyolaw.com](mailto:restituyo@restituyolaw.com)>  
**Cc:** Birenboim, Bruce <[bbirenboim@paulweiss.com](mailto:bbirenboim@paulweiss.com)>; Johnson, Jeh C <[jjohnson@paulweiss.com](mailto:jjohnson@paulweiss.com)>; Buergel, Susanna M <[sbuergel@paulweiss.com](mailto:sbuergel@paulweiss.com)>  
**Subject:** RE: Cardwell v. Davis Polk et al., 19-cv-10256

Many thanks. May we assume that you also consent to service by email for other discovery exchanges (e.g. requests for production, interrogatories, and production letters)?

Best,

Marissa

**Marissa C.M. Doran** | Associate  
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**From:** David Jeffries <[djeffries@jeffrieslaw.nyc](mailto:djeffries@jeffrieslaw.nyc)>  
**Sent:** Saturday, January 18, 2020 7:10 PM  
**To:** Doran, Marissa <[mdoran@paulweiss.com](mailto:mdoran@paulweiss.com)>; [restituyo@restituyolaw.com](mailto:restituyo@restituyolaw.com)  
**Cc:** Birenboim, Bruce <[bbirenboim@paulweiss.com](mailto:bbirenboim@paulweiss.com)>; Johnson, Jeh C <[jjohnson@paulweiss.com](mailto:jjohnson@paulweiss.com)>; Buergel, Susanna M <[sbuergel@paulweiss.com](mailto:sbuergel@paulweiss.com)>  
**Subject:** Re: Cardwell v. Davis Polk et al., 19-cv-10256

Hello Marissa,

Thank you for reaching out. We consent to service by email for initial disclosures.

Kind regards,

David

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**From:** Doran, Marissa <[mdoran@paulweiss.com](mailto:mdoran@paulweiss.com)>  
**Sent:** Saturday, January 18, 2020 12:54:22 PM  
**To:** David Jeffries <[djeffries@jeffrieslaw.nyc](mailto:djeffries@jeffrieslaw.nyc)>; [restituyo@restituyolaw.com](mailto:restituyo@restituyolaw.com) <[restituyo@restituyolaw.com](mailto:restituyo@restituyolaw.com)>  
**Cc:** Birenboim, Bruce <[bbirenboim@paulweiss.com](mailto:bbirenboim@paulweiss.com)>; Johnson, Jeh C <[jjohnson@paulweiss.com](mailto:jjohnson@paulweiss.com)>; Buergel, Susanna M <[sbuergel@paulweiss.com](mailto:sbuergel@paulweiss.com)>  
**Subject:** Cardwell v. Davis Polk et al., 19-cv-10256

Dear David and Martin,

We hope you are having a pleasant holiday weekend.

We are writing in advance of Monday's deadline to exchange initial disclosures. Do you consent to service by email for the submissions in this matter? We are of course happy to extend the same courtesy.

Many thanks,

Marissa

**Marissa C.M. Doran** | Associate

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